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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re

GENERAL MOTORS CORP., *et al.*,

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

Judge Robert E. Gerber

**THE REGENTS OF THE UNIVERSITY OF MICHIGAN'S OBJECTION
TO SUFFICIENCY OF CERTAIN OF DEBTOR'S NOTICES OF
PROPOSED CURE AMOUNT IN CONNECTION WITH
ASSUMPTION AND ASSIGNMENT OF EXECUTORY CONTRACTS**

The Regents of the University of Michigan ("University"), state as follows for the University's Objection to Sufficiency of Certain of Debtor's Notices of Proposed Cure Amount in Connection with Assumption and Assignment of Executory Contracts and to Sufficiency of Notice:

Background

1. General Motors Corporation (“GM”) and its related debtors filed their voluntary petitions commencing this case on June 1, 2009.

2. The University provides services to GM under a large number of different contracts, including sponsored research contracts.

Objection to the Sufficiency of GM’s Notice

3. The University received from GM two additional Notices of (I) Debtors’ Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property and Unexpired Leases of Nonresidential Real Property and (II) Cure Amounts Related Thereto (the “Notices”) since the University filed objections on June 12, 2009 to the first notice it received.

6. The Notices do not itself identify which of the agreements with the University GM proposes to assume and assign. Instead, the Notice referred the University to a secure internet website where the University was supposed to be provided with additional information identifying which contracts were to be assumed and assigned and stating the Cure Amount associated with those particular contracts. Copies of the screen prints from the secured website associated with the Notices are attached to this objection collectively as Exhibit A.

7. As indicated on Exhibit A, the cumulative effect of the written Notices and the information contained in GM’s secure website is insufficient to identify the contracts GM proposes to assume and assign or the associated Cure Amount. The information provided does not even include GM’s purchase order number.

8. Consequently, the University objects to the sufficiency of the notice of Cure Amount provided to it because the essential information necessary to permit the University to identify the contracts being assumed and assigned by GM has not been provided. For this reason, the University cannot be justly bound to the (absent) Cure Amounts provided by GM's secure website associated with the Notices.

Conclusion

For the reasons stated above, the University objects to the sufficiency of GM's notice of the Cure Amount that GM provided to the University and requests that the Court not hold the University to any proposed Cure Amount based on this incomplete information.

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

By /s/ Donald J. Hutchinson
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Dated: June 15, 2009

CERTIFICATE OF SERVICE

Donald J. Hutchinson hereby certifies that, on the 16th day of June, 2009, he served a copy of the foregoing document, *The Regents of the University of Michigan's Objection to Sufficiency of Certain of Debtor's Notices of Proposed Cure Amount in Connection with Assumption and Assignment of Executory Contracts* upon each of the persons listed on the attached Exhibit A, by Federal Express Priority Overnight Mail so as to be received by each of the persons listed on the attached Exhibit a before 4:00 p.m., June 17, 2009.

Dated: June 16, 2009

By /s/ Donald J. Hutchinson

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EXHIBIT A

SERVICE LIST

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